

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK----- x  
UNITED STATES OF AMERICA

: - v. -

ANDRE LAMAR,

: Defendant.

----- x  
18 CRIM 023COUNT ONE

(Bank Fraud)

The Grand Jury charges:

1. From at least in or about May 2017, to in or about December 13, 2017, in the Southern District of New York and elsewhere, ANDRE LAMAR, the defendant, willfully and knowingly, did execute and attempt to execute a scheme or artifice to defraud a financial institution, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, LAMAR obtained a stolen check in the amount of \$100,000 from the mail, and deposited the check into a bank account without the authorization or consent of the check's payee.

(Title 18, United States Code, Section 1344.)

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DATE FILED: JAN 10 2018SEALED INDICTMENT

18 Cr.

**FORFEITURE ALLEGATION**

2. As a result of committing the offenses alleged in Count One of this Indictment, ANDRE LAMAR, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), all property that constitutes, or is derived from, proceeds obtained directly or indirectly as a result of said offenses, including but not limited to a sum of money representing the amount of proceeds obtained directly, or indirectly as a result of said offenses.

**Substitute Assets Provision**

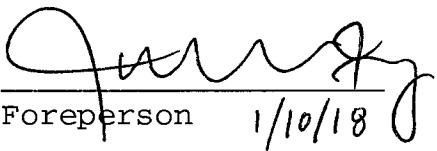
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

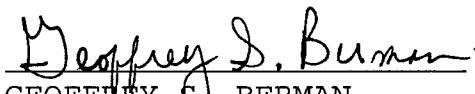
- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of said defendants up to the value of the above  
forfeitable property.

(Title 18, United States Code, Section 982(a)(2);  
Title 21, United States Code, Section 853(p).)

  
Foreperson 1/10/18

  
Geoffrey S. Berman  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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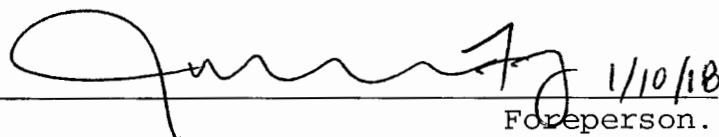
SEALED INDICTMENT

18 Cr. \_\_\_\_

(18 U.S.C. §§ 1344.)

GEOFFREY S. BERMAN  
United States Attorney.

A TRUE BILL

  
1/10/18  
Foreperson.

1/10/18 PA 100-14-07 This case is now and so  
Judge Keenan for all purposes   
Judge Moyer